

EXHIBIT J

TO

AFFIDAVIT OF MATTHEW S. BORICK

Douglas Fleurant
June 22, 2018

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT
CIVIL ACTION NO.: 5:16-cv-00310-gwc

MYWEBGROCER, INC., *

PLAINTIFF *

COUNTERCLAIM DEFENDANT *

v. *

ADLIFE MARKETING & *

COMMUNICATIONS CO., INC., *

DEFENDANT *

COUNTERCLAIM PLAINTIFF *

DEPOSITION OF: DOUGLAS FLEURANT

ADLER, POLLOCK & SHEEHAN, P.C.

One Citizens Plaza, 8th Floor

Providence, Rhode Island

June 22, 2018 11:19 a.m.

Pauline L. Bailey

Professional Reporter

Douglas Fleurant
June 22, 2018

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1 Q. And do you have any -- any on-line
2 receipts or any other records that come from the
3 copyright office?

4 A. Yes, I would have e-mails signifying
5 that the payment has been made.

6 Q. Okay. So, you have those e-mails?

7 A. Yes.

8 Q. Do you still have those e-mails?

9 A. I am sure I -- I store them all.

10 Q. Okay. And where do you store the e-
11 mails?

12 A. In my Google e-mail, my Google mail.

13 Q. Were you asked to provide those as
14 part of the discovery process from counsel to
15 provide those e-mails?

16 A. No one specifically asked me to
17 produce those.

18 Q. Okay. Did you -- were you involved
19 in actually in producing information for the
20 discovery process in this case?

21 A. Not personally.

22 Q. Okay. Not personally, so you weren't
23 asked to look for information?

24 A. No, I -- I do not recall any specific
25 request from me for information.